

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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September 9, 2022

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: **United States v. Sayfullo Saipov**
(S1) 17 Cr. 722 (VSB)

**APPLICATION GRANTED
SO ORDERED** *Vern Brod*
VERNON S. BRODERICK
U.S.D.J. 09/13/2022

The Defense shall file substantive instructions regarding the elements of the offenses charged by September 16, 2022.

Dear Judge Broderick,

Enclosed is Sayfullo Saipov's proposed requests to charge for the liability phase, with the exception of an instruction regarding his theory of the defense, and minus substantive instructions regarding the elements of the offenses charged. The defense respectfully requests leave to file substantive instructions regarding the elements of the offenses charged by September 16, 2022. The defense requires additional time to complete this discrete aspect of Mr. Saipov's proposed liability-phase instructions, and we thank the Court in advance for its consideration.

Respectfully Submitted,

/s/
David E. Patton, Esq.

Counsel for Sayfullo Saipov